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Attorney for the County Central Committee Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA**

RAVALLI COUNTY REPUBLICAN CENTRAL)	
COMMITTEE, GALLATIN COUNTY)	Case No. CV 14-0058-H-BMM
REPUBLICAN CENTRAL COMMITTEE,)	
SANDERS COUNTY REPUBLICAN CENTRAL)	OBJECTION OF THE COUNTY
COMMITTEE, DAWSON COUNTY)	CENTRAL COMMITTEE
REPUBLICAN CENTRAL COMMITTEE,)	PLAINTIFFS TO VACATING
STILLWATER COUNTY REPUBLICAN)	THE HEARING SCHEDULED
CENTRAL COMMITTEE; RICHLAND COUNTY)	FOR SEPTEMBER 24, 2015
REPUBLICAN CENTRAL COMMITTEE;)	
CARBON COUNTY REPUBLICAN CENTRAL)	
COMMITTEE; FLATHEAD COUNTY)	
REPUBLICAN CENTRAL COMMITTEE;)	
MADISON COUNTY REPUBLICAN CENTRAL)	
COMMITTEE; BIG HORN COUNTY)	
REPUBLICAN CENTRAL COMMITTEE;)	
MONTANA REPUBLICAN PARTY,)	
)	
Plaintiffs,)	
v.)	
)	
LINDA McCULLOCH, in her official capacity as)	
Montana's Secretary of State, <i>et al.</i> ,)	
)	
Defendants.)	

On August 28, 2015, Plaintiff Montana Republican Party moved to
withdraw its motion to disqualify Dep. Attorney General Jon Bennion. Later that

day, Mr. Bennion filed a motion to withdraw as counsel for Defendants. The County Central Committee Plaintiffs take no position as to either of these motions.

The County Central Committee Plaintiffs object, however, to vacating the disqualification hearing set for September 24, 2015. The County Central Committee Plaintiffs have a separate disqualification motion pending before the Court. Mr. Bennion's departure from this case does not moot that motion because, as stated in their motion, the County Central Committee Plaintiffs also seek the following relief:

- (1) Identification of all communications between members of the Attorney General's office and officers of the Plaintiffs concerning this case for which consent was not given by Plaintiffs' counsel (James Brown concerning communications with the state party or Matthew Monforton concerning communications with the county committees) as required by ABA Rule 4.2. Plaintiffs have evidence of at least two such communications and have reason to believe that there have been others; and
- (2) Disclosure to Plaintiffs of all documents relating to such communications.

This relief is required in order for Plaintiffs to evaluate how their case has been prejudiced as a result of the State's ethics violations. The State has not provided a sworn statement addressing these issues, something that would likely obviate the need for an evidentiary hearing. The County Central Committee Plaintiffs therefore request that the hearing set by this Court for September 24,

2015 remain on calendar.

DATED: August 30, 2015

Respectfully submitted,
Monforton Law Offices, PLLC

/s/ Matthew G. Monforton
Matthew G. Monforton

Attorney for the County Central
Committee Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY this 30th day of August, 2015, that a copy of the foregoing will be delivered this day via the Court's ECF system to the following:

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Attorney for Plaintiff Montana Republican Party

DATED: August 30, 2015

Respectfully submitted,
Monforton Law Offices, PLLC

/s/ Matthew G. Monforton
Matthew G. Monforton

Attorney for the County Central
Committee Plaintiffs